

Mr. Wilson Project Area POC Risk Key Analysis

EA# OR-118-04-007
(Supplement to EA# OR-110-01-030)

March 2004

Type of statement:	Supplemental Environmental Assessment
Lead agency:	U.S. Department of Interior Bureau of Land Management Medford District, Glendale Resource Area
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Chapter 1 - Introduction

The Bureau of Land Management and the U.S. Forest Service have recently published the 2004 Final Supplemental Environmental Impact Statement on Management of Port-Orford-cedar in Southwest Oregon (“2004 POC FSEIS”). The 2004 POC FSEIS proposes to amend the land and resource management plans for the Coos Bay, Medford, and Roseburg BLM Districts and the Siskiyou National Forest by replacing existing management direction with direction in Alternative 2 of the FSEIS. This FSEIS presents new information on Port-Orford-cedar (POC) and in Alternative 2 proposes use of a Risk Key that clarifies the environmental conditions at the 7th field watershed level which would require the implementation of one or more site-specific disease-controlling management practices for POC. Because the 2004 POC FSEIS, including the Risk Key, is new information that was not available at the time we completed the Mr. Wilson timber sale environmental assessment (EA #OR110-01-030) and signed the Decision Record on October 26, 2001, we have decided to amend the existing analysis of the Mr. Wilson EA in order to add an evaluation of whether there is a need for site-specific POC mitigation measures through application of the proposed Risk Key in the 2004 POC FSEIS to the Mr. Wilson timber sale.

Chapter 2 – Addendum to Mr. Wilson EA Effects Analysis

We have analyzed the risks to Port-Orford-cedar from actions within the Preferred Alternative (Alt. 5) of the Mr. Wilson Timber Sale through the use of the Port-Orford-cedar Risk Key present in Table 2-1 of the FEIS for the Management of Port-Orford-cedar (p.2-18, 1/2004). See Attachment 1. This analysis shows the Mr. Wilson timber sale will have no effects to Port-Orford-cedar.

Actions to be analyzed were taken from the Preferred Alternative (Alt. 5) of the Mr. Wilson EA. We reviewed the Record of Decision for the Mr. Wilson Timber Sale to determine if actions analyzed within the EA had been deleted or modified. We also compared the Mr. Wilson Timber Sale prospectus to the actions proposed in the EA. (Some actions would be done under the timber sale. Other actions would be completed under separate contracts.) Actions remaining to be done are presented within the attached tables. Actions were divided into three categories. Page 1 of 4 analyzes actions associated with the individual timber sale units and would include activities such as the harvest, site preparations, ripping of skid trails and reforestation. Pages 2 and 3 of 4 analyze actions associated with roads/road systems to be used within the timber sale. Operations would include road use, roadside brushing, renovation, drainage improvement, log hauling, and decommissioning. Page 4 of 4 analyzes other project-associated actions such as helipad development and use, planting of areas adjacent to units and restoration actions. Activity area (action) was defined as the area where something physical was to take place such as the cutting and falling of a tree, broadcast burning was to be done, or that roads were to be used for log hauling.

“Yes/No” answers for the key Port-Orford-cedar Risk Key was then determined by employing the following procedures. Definitions and examples for the Risk Key were reviewed (FSEIS p.2-19 and p.2-20). Action locations were then compared to known locations of Port-Orford-cedar. Action locations were then reviewed to see if they were within an uninfested 7th field watershed as defined in Alternative 6 of the POC FEIS. Finally, using the definitions and guidelines listed with the Risk Key, we determined the answer to the first three Key questions would be “No” for all units and actions for the following reasons: POC is not found in the units of the Mr. Wilson timber sale; the single known location of uninfested POC near the activity area is in an area located along the haul route (road 32-8-1.1, T.32S. R.8W. section 9)¹, but the Port-Orford-cedar at this location has no ecological, tribal, or product use or function that measurably contributes to meeting land and resource management objectives, nor would infection of these presently uninfested POC spread infection to trees that meet this description. The POC near the haul route is a minor component of the stand at this location. While there may be individual uninfested Port-Orford-cedar near the road, loss of Port-Orford-cedar in this area would not prevent land and resource management plan objectives from being met, because the ecological conditions and forest structures would not be measurably affected by the loss of the few POC trees in the area. Further, the cedars are in a Riparian Reserve, thus there would be no tribal use loss. Under the Risk Key, because the answer to all three of these preliminary questions is “no,” additional site-specific management measures for POC are not required.

2.1 Cumulative Effects

The issue of concern throughout this additional analysis is the Port-Orford-cedar in the West Fork Cow Creek Watershed. Through application of the Risk Key of the 2004 POC FSEIS to the Mr. Wilson timber sale, we can identify no impacts to POC. Because the Mr. Wilson timber sale has no impacts to POC, the timber sale will have no incremental, cumulative effect to POC in the planning area of the Mr. Wilson timber sale (the West Fork Cow Creek watershed), which, as described in the Mr. Wilson ES, includes several other timber harvest projects. Because this sale would add no impacts on POC to these other activities taking place in the watershed, there are no significant cumulative impacts to POC as a result of implementing the Mr. Wilson timber sale. Even if the sale did have an impact on POC, the most important critical element affected would be the health of the riparian system, but only if POC were present in large quantities in the riparian area. Because the riparian areas in the West Fork Cow Creek watershed are of mixed species, and POC does not represent more than a small percentage of the shade producing species in riparian areas, the health of the riparian system would not be a concern even if the sale had an impact on POC. That is because other conifer and hardwood species are of sufficient number and size to maintain the shading of the stream, the ecological function of the vegetative resources in the riparian areas.

This addendum to the Mr. Wilson EA also tiers to the effects analysis of the 2004 POC FSEIS, including the cumulative effects analysis of the FSEIS. Any significant cumulative effects concerning POC within the range of POC, including the Medford District and the areas of the

¹ haul route is paved in this section and is open to use by the general public.

Mr. Wilson timber sale, have already been considered in this FSEIS. The POC FSEIS discloses the cumulative effects to federal lands as a result of current POC management practices and timber harvest on on-federal lands. (FSEIS p. 3&4-8 to 3&4-11), and also discloses the past harvest and mortality of POC on all lands, non-federal and federal, (FSEIS p.3&4-12). The POC FSEIS discloses that of the four resource areas on the Medford District, POC is native in the Grants Pass Resource Area and the Medford District. Surveys at the 5th field watershed level show 25,485 acres of healthy POC and 2,340 acres of infested stands in the entire Medford District. (FSEIS p. 3&4-25 to 3&4-26). The FSEIS discusses the cumulative effects of the Biscuit Fire relative to POC in risk regions within Oregon and California. (FSEIS p.3&4-30 to 3&4-31). The FSEIS also discusses cumulative effects of timber harvest activities generally, such as harvesting and transporting annual volume from federal forests, on the spread of PL. (FSEIS p. 3&4-3- to 3&4-149).

With regard to specific cumulative effects discussion in the FSEIS relevant to the cumulative effects of *PL*-related mortality in the Mr. Wilson timber sale, and other reasonably foreseeable timber harvest projects in the West Fork Cow Creek watershed, the FSEIS discusses *PL*-related mortality and timber harvest in high-risk riparian areas, the concerns for the snag and down log requirements of wildlife, as well as concern over effects of timber harvest and POC-mortality on genetic resources. The FSEIS identified significant cumulative effects to POC in riparian areas as those effects occurring within the high risk zone that consists of a 10 to 25 foot area on either significant, incremental or cumulative impact to riparian areas and the riparian function of POC, and the fact that the Mr. Wilson timber sale is not harvesting in riparian areas. The FSEIS reiterates that timber harvest and other non-*PL* related effects to POC in riparian areas are expected to be insignificant, give Northwest Forest Plan restrictions on removing timber from such areas (FSEIS p. 3&4-70 to 3&4-71). None of the other reasonably foreseeable timber harvest projects in the West Fork Cow Creek watershed identified in the Mr. Wilson EA include harvest in riparian areas, or harvest of any POC, thus the cumulative effects to POC and riparian areas as a result of the Mr. Wilson timber sale and these other reasonably foreseeable future timber harvest projects in the watershed are zero.

The FSEIS discussion of cumulative effects of *PL*-caused mortality and timber harvest to relevant to wildlife, states that no wildlife species were identified that were exclusively linked to POC, and that cumulative effects to wildlife are better linked to loss of specific habitat components, such as snags and down wood requirements (FSEIS p.3&4-105). The FSEIS discloses that only those timber sales and other tree-removing activities that affect long-term snag recruitment would have a cumulative detrimental effect where *PL*-mortality decreases the contribution of POC to snags and down log components over the long term. The FSEIS adds, however, that no harvest method reduces long-term snag availability because trees are a renewable resource, and grow back after harvest. (FSEIS p.3&4-105).

The FSEIS also discloses the cumulative effect of timber harvest and *PL*-caused mortality on genetic resources, and finds that while timber harvest in the Matrix and other management activities may potentially affect a considerable acreage of POC in total, timber harvest will never remove enough POC in one place to be a genetic concern, even in conjunction with *PL*-related

mortality (FSEIS p. 3&4-125). Neither the Mr. Wilson timber sale units, nor other reasonably foreseeable future timber harvest projects contain POC, thus no POC is being harvested in these sales. Consequently, genetic resource concerns are not an issue relevant to the cumulative effects of the Mr. Wilson timber and foreseeable projects. Based on all of the above reasons, especially in light of other reasonably foreseeable future federal and non-federal timber harvest projects and past, present and foreseeable *PL*-related mortality to POC on federal and non-federal lands, the sale will have no significant cumulative effects to POC.

2.2 Mitigation

Because the answers to all three of the preliminary questions of the Risk Key are “no”, additional site-specific management measures for POC are not required for the Mr. Wilson timber sale. The Mr. Wilson EA contained a provision calling for washing of heavy equipment before moving onto federal lands for the purpose of removing soil and plant parts. (Mr. Wilson EA p. 19). We included this provision to prevent the spread of noxious weeds, and to provide an incidental benefit if there was any public concern over POC as a result of implementing the Mr. Wilson timber sale. This provision remains a part of the Mr. Wilson EA, however, the reader should construe the provision as a measure to prevent the spread of noxious weeds, not as an admission of concerns over POC. The Risk Key analysis that we performed above demonstrates that there is no risk to POC as a result of implementing the Mr. Wilson timber sale.

Chapter 3 - Persons and Agencies Consulted

3.1 Persons and Agencies Consulted

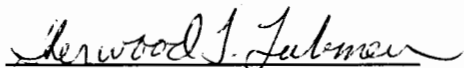
A legal notice will be placed in local newspapers to announce to the public that the Glendale Resource Area is requesting public comments on the proposed management action. In addition, notification of this proposal will be sent to the Oregon Department of Fish and Wildlife, the Oregon Dept. of Forestry, county commissioners for the affected county, several environmental groups, and representatives of the timber industry to request their comments. These announcements will be made following completion of this environmental assessment and before a decision is made. The Field Manager will consider all input before reaching a finding or making a decision concerning this proposal.

List of Preparers

<u>Name</u>	<u>Title</u>	<u>Primary Responsibility</u>
Sherwood Tubman	Ecosystem Planner	NEPA
Jim Brimble	District POC Coordinator	POC
Doug Stewart	Forester	Silviculture
Rachel Showalter	Botanists	Botany
Loren Wittenberg	Hydrologist	Hydrology, Riparian

In this document, the Mr. Wilson timber sale decision maker has applied the FSEIS risk key, thus substantiating earlier site-specific analysis and considering new information concerning the project's possible effects to POC as required by the applicable LUPs in compliance with the Medford District RMP and FLPMA. On the basis of applying the FSEIS risk key above, the decision maker has determined that the risk of the action to POC is low, thus no site-specific management practices are required.

The Proposed Action has been screened for compliance with the Endangered Species Act, The American Indian Religious Freedom Act, Historic Preservation Act, Bureau of Land Management policies related to the ecosystem objectives and concepts in the Medford District Resource Management Plan (RMP) and with the Aquatic Conservation Strategy of the Northwest Forest Plan. Furthermore, this action has been screened from a landscape perspective and there are no effects anticipated from this action that would foreclose future management options in relation to the watershed management objectives identified through the Ecosystem Analysis.



Ecosystem Planner

Reviewed for format and consistency

Date

4/2/04